

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

AUTOSCRIBE CORPORATION	§	
	§	
Plaintiff	§	Case No. 1:24-cv-04282-SCJ
	§	
v.	§	JURY TRIAL DEMANDED
	§	
M&A VENTURES, LLC	§	
	§	
Defendant.	§	

JOINT MOTION TO EXTEND DEADLINES

Plaintiff Autoscribe Corporation (“Autoscribe”) and Defendant M&A Ventures, LLC (“M&A”) jointly file this Motion to extend the deadline for the end of the Fact Discovery Period beyond the deadline prescribed by the LPR 6.7 and to further adopt the Proposed Litigation Schedule attached as Exhibit A.

The parties proposed in their Joint Preliminary Report and Discovery Plan (Dkt. 128) a date for the end of fact discovery forty-five (45) days after the Court’s claim construction ruling pursuant to LPR 6.7. The Court issued its Claim Construction Ruling adopting the Report and Recommendation of the Special Master on June 12, 2025 (Dkt. 165). Following the Court’s ruling, the tentative deadline for fact discovery is July 28, 2025.

Given the status of the case and the complexity of the issues, both parties agree that additional time is necessary for a fulsome completion of document

discovery and deposition of fact witnesses.

Additionally, Autoscribe has filed a Motion to Amend its Complaint and a Motion to Amend Infringement Contentions to add (1) a theory of divided infringement and (2) an additional product, Payrazr. (Dkt. 159, 162.) M&A opposes both Motions. (Dkt. 168, 171.) The Court has yet to rule on either Motion.

In light of the additional discovery needed to be completed, the parties respectfully request a sixty (60) day extension of the deadline for close of fact discovery from July 28, 2025 to September 26, 2025. The Parties also attach a proposed litigation schedule as Exhibit A including the remaining case deadlines. In the event that Autoscribe's Motions to Amend are granted in whole or in part, the parties may request an additional extension of time.

Dated: July 3, 2025

Respectfully submitted,

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**COUNSEL FOR DEFENDANT M&A
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CERTIFICATE OF SERVICE

I hereby certify that counsel of record was served this Notice of Service via the Court's ECF system on July 3, 2025.

/s/ Marron E. Frith

Marron E. Frith

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D), I hereby certify that the foregoing has been prepared in compliance with Local Rule 5.1(B) in 14-point Times New Roman font.

/s/ Marron E. Frith

Marron E. Frith

EXHIBIT A**PROPOSED LITIGATION SCHEDULE**

Task	(Patent) Local Rule	Deadline per Local Rule (or Docket entry for prior events)	Parties' Proposed Date (for future deadlines)
Opening Claim Construction Briefs	LPR 6.5(a)	(Dkt. 128)	December 12, 2024
Responsive Claim Construction Briefs	LPR 6.5(b)	(Dkt. 128)	January 24, 2025
Claim Construction Hearing	LPR 6.6		March 6, 2025
Special Master's Report and Recommendation on Claim Construction		(Dkt. 154)	April 23, 2025
Court's Order Adopting Special Master's R&R		(Dkt. 165)	June 12, 2025
Autoscribe's Motion for Leave to File Amended Complaint and Amended Infringement Contentions		(Dkt. 160, 162)	June 4, 2025
M&A's Opposition to Motion for Leave to File Amended Complaint and Amended Infringement Contentions	L.R. 7.1(B)	(Dkt. 169, 171)	June 18, 2025
Autoscribe's Reply in Support of Motion for Leave to File Amended Complaint and Amended Infringement Contentions	L.R. 7.1(C)		July 2, 2025
Court's Order on Motion for Leave to File Amended Complaint and Amended Infringement Contentions			TBD
End of Fact Discovery Period	LPR 6.7	45 days after Court's claim	September 26, 2025

		construction ruling + 60 day extension	
Initial Expert Witness Disclosures – Issues on which each party bears the burden of proof	LPR 7.1(b)	30 days after end of fact discovery	October 27, 2025
Initial Expert Witness Disclosures – Issues on which the opposing party bears the burden of proof	LPR 7.1(c)	30 days after initial expert disclosures	December 5, 2025
Rebuttal Expert Witness Disclosures	LPR 7.1(d)	10 days after second expert disclosures	December 19, 2025
Depositions of Expert Witnesses Begin	LPR 7.2	7 days after rebuttal expert disclosures	January 5, 2026
Deposition of Expert Witnesses End	LPR 7.2	30 days after depositions of expert witnesses begin	February 4, 2025
Dispositive Motion Deadline	LR 56.1	30 days after end of period for expert depositions	March 6, 2025
Pretrial Statement	LR 16.4	30 days after Court's ruling(s) on dispositive motions	TBD
Pretrial Conference			TBD
Trial			TBD